

**UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

IN RE TESLA INC. STOCKHOLDER
DERIVATIVE LITIGATION

Lead Case No.: 1:22-cv-00592-LY

(Consolidated with Case No. 1:22-cv-
00611-LY)

This Document Relates To:

All Cases

AGREED MOTION TO SET PAGE LIMITS OF PLEADINGS
FILED IN RESPONSE TO PLAINTIFFS' CONSOLIDATED COMPLAINT

COME NOW Plaintiffs Solomon Chau and Alvin Janklow ("Plaintiffs") and Defendants Elon Musk, Robyn Denholm, Kimbal Musk, Ira Ehrenpreis, James Murdoch, Lawrence J. Ellison, Kathleen Wilson-Thompson, Hiromichi Mizuno, Antonio J. Gracias, Stephen T. Jurvetson, Brad W. Buss, Linda Johnson Rice, and Nominal Defendant, Tesla, Inc. ("Defendants," together with Plaintiffs, the "Parties") move for an extension to the page limits of the responsive pleadings. In support of this motion, the Parties state and propose as follows:

1. Defendants' responses to the Consolidated Complaint are due on November 7, 2022.
2. Rather than file multiple motions on behalf of the various groups of defendants, which would necessitate multiple oppositions, the Parties have met and conferred, and to conserve judicial resources and promote efficiency, propose filing omnibus briefs in support and in opposition of Defendants' motion(s) to dismiss as noted below.
3. The Parties propose that Defendants file an omnibus Motion to Dismiss not to exceed twenty-five (25) pages.

4. The Parties propose that Plaintiffs file an omnibus Opposition to Defendants' Motion to Dismiss not to exceed thirty (30) pages.
5. The Parties propose that Defendants file an omnibus Reply in support of Defendants' Motion to Dismiss not to exceed fifteen (15) pages.

WHEREFORE, the Parties pray for an order setting the page limits of the pleadings filed in response to Plaintiffs' Consolidated Complaint.

Dated: November 1, 2022

Respectfully Submitted,

/s/ Boris Feldman

Boris Feldman (*admitted pro hac vice*)

Doru Gavril (*admitted pro hac vice*)

Jennifer Loeb (*admitted pro hac vice*)

Rebecca Lockert (*pro hac vice pending*)

Olivia Rosen (*pro hac vice pending*)

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Dated: November 1, 2022



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CERTIFICATE OF CONFERENCE

I certify that on October 31, 2022, I conferred with counsel for Plaintiffs, Shane P. Sanders and Gregory Del Gaizo, regarding this motion and they stated that they agree with the relief requested herein.

/s/ Doru Gavril

Doru Gavril

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was filed with the Court's electronic case filing (ECF) system on November 1, 2022, which caused an electronic copy of this document to be served on all counsel of record in this matter who have registered for ECF service.

/s/ Gary Ewell

Gary Ewell